# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMERICA §

Vs. 

\$ CR. NO. H-09-342

\$ (Hon. David Hittner)

\$ ROBERT ALLEN STANFORD,

### MOTION TO WITHDRAW AS ATTORNEY OF RECORD

#### TO THE HONORABLE JUDGE OF SAID COURT:

Dick DeGuerin and the law firm of DeGuerin & Dickson, and all counsel working with Dick DeGuerin, hereby move to withdraw from representing Allen Stanford herein, in favor of Robert D. Luskin of Patton Boggs, in Washington, D. C., respectfully showing as follows:

- 1. Allen Stanford has refused to authorize undersigned counsel to seek assurances of future legal fees and expenses.
- 2. Undersigned counsel received today a copy of a public relations statement issued by Qorvis Communications that states:
  - "Mr. R. Allen Stanford today announced that the law firm of DeGuerin and Dickson has been replaced as criminal defense counsel. Mr. Stanford will be represented on pending criminal matters by the law firm of Patton Boggs. Mr. Robert Luskin, partner, will lead the Patton Boggs team."

- 3. At 2:10 p.m. today, Dick DeGuerin received a fax from Allen Stanford asking that Patton Boggs substitute as counsel in place of Dick DeGuerin and associated counsel.
- 4. Dick DeGuerin and his associated lawyers are unwilling to go forward without the assurance of being paid for work in the future.
- 5. Allen Stanford has requested that Dick DeGuerin and associated counsel withdraw in favor of Patton Boggs.

WHEREFORE, Dick DeGuerin and associated counsel move to be relieved of any further responsibility in this cause for Allen Stanford.

Respectfully submitted,

DeGuerin & Dickson

/S/ Dick DeGuerin

Dick DeGuerin
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Facsimile: 713-223-9231 Lawyers for Defendant

### **CERTIFICATE OF CONFERENCE**

Undersigned counsel has conferred with Assistant United States Attorney Paul Pelletier, who has no objection to this motion with the understanding that substitute counsel be entered for Allen Stanford.

/S/ Dick DeGuerin		
Dick DeGuerin	<del></del>	 

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of **Motion to Withdraw as Attorney of Record** has been filed via the ECF System on July 31, 2009. Additionally, a copy of this Motion has been furnished to Defendant, Allen Stanford by hand delivery on July 31, 2009

/S/ Dick DeGuerin	
Dick DeGuerin	